



*State of Illinois*  
**ENVIRONMENTAL PROTECTION AGENCY**  
**MEMORANDUM**

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**DATE:** September 29, 2010  
**TO:** Division Files - Bureau of Land  
**FROM:** Chris Cahnovsky – Collinsville Region  
**SUBJECT:** 1198010003 – Madison County  
Estate of Chemetco  
FOS File

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On September 15, 2010, Michelle Cozadd and I conducted an inspection at Chemetco, Inc. Present during this inspection were Jorge Garcia, ES&H Manager for the Estate of Chemetco and Mike Murray of AIS.

**TANK HOUSE**

The demolition of the tanks within the Tank House is complete. The lead liners have been moved to a pile on the east side just outside the Tank House. Doe Run in Herculaneum, Missouri has purchased the lead liners for their refining process. AIS is continuing to load the concrete from the tanks in trucks for shipment to Roxana Landfill. To date AIS has shipped four loads of concrete to Roxana Landfill totaling 22.9 tons. On September 13 and 14, 2010, AIS shipped out 14 loads of scrap metal to Grossmen totaling 198.43 tons.

The Tank House still contains a significant amount of concrete. I explained to Mr. Garcia and Mr. Murray that I was concerned that concrete mixed with fines (metal bearing materials or MBM) were going to be taken to the Fines Building. I pointed to several areas within the work zone that I had concerns with. Mr. Murray stated that he intended to send concrete that was mixed with the fines to the Fines Building. He stated that the concrete would be crushed and treated by Paradigm. I explained that I did not think that the concrete had recoverable amount of metals in it to be considered MBM.

Mr. Jorge showed us the area of the Tank House referred to as the Hallway. The Hallway is an area on the north side of the Tank House that extends the length of the building. This area has been cleaned out and the remaining fines have been accumulated at the east end of the Hallway. These fines are being taken over to the Fines Building.

Mr. Jorge pointed out the Caustic Tank that has been sold to Tank Trailer Cleaning (TTC) is East St. Louis, Illinois. TTC has developed a work plan for the removal of this 8,500 gallon tank. The tank current contains about 4,000 gallons of sodium hydroxide.

## **FINES BUILDING**

I then inspected the Fine Building. In this building I observed about four loads of concrete mixed with scrubber sludge. These piles contained large pieces of concrete with protruding rebar. I observed other trash mixed in with the concrete. It appears that this material meets the definition of general construction or demolition debris and not metal bearing material that Paradigm can use in their process. I explained to Mr. Garcia that no more concrete could be placed in this building.

I also observed a pile of fines from the Hallway area of the Tank House. This pile contained trash such as a filter press frame, wood, pipe and other waste. I explained that this type of material is a waste and not MBM. I explained to Mr. Garcia that no more MDM or waste can be brought to the Fines Building until the waste material was removed. Mr. Garcia provided copies of the weekly inspection of the Fines Building to the Agency for review.

CNC

cc: Regional Files  
cc: Erin Rednour  
cc: Michelle Kerr - USEPA

Chemetco  
Superfund Tech**Cahnovsky, Chris**

**From:** jorge garcia [jgarcia@chemetcoestate.com]  
**Sent:** Wednesday, September 15, 2010 1:29 PM  
**To:** Cahnovsky, Chris  
**Subject:** photos from the fines building  
**Attachments:** fnesbldg-9-15-10 004.jpg; fnesbldg-9-15-10 001.jpg; fnesbldg-9-15-10 002.jpg; fnesbldg-9-15-10 003.jpg

Chris-

As per our phone conversation, AIS has removed the debris from the pile. I am enclosing pictures of the material that was removed from the stock pile, and the current condition of the stock pile. As I mentioned in our phone conversation, AIS is in the process of dismantling a screener that was formerly used at the site. The screener will be taken to the Tank House area and will be used to screen out the larger chunks of concrete, rebar, and other miscellaneous materials. The screened material will be loaded and taken to the fines building for future process. The material that does not get screened out, will be loaded out and placed in roll off for disposal.

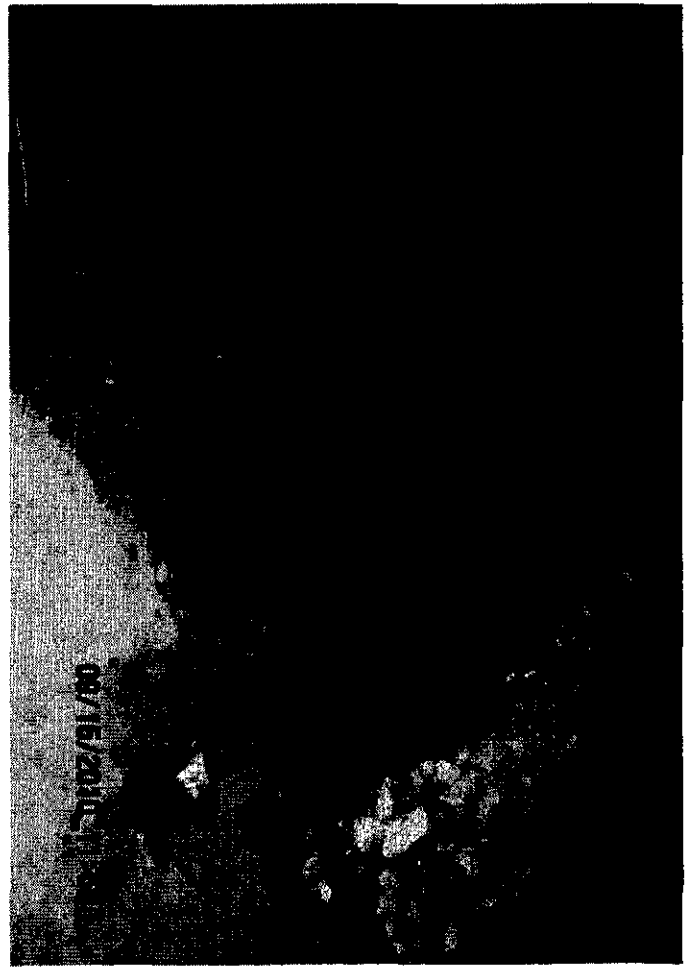
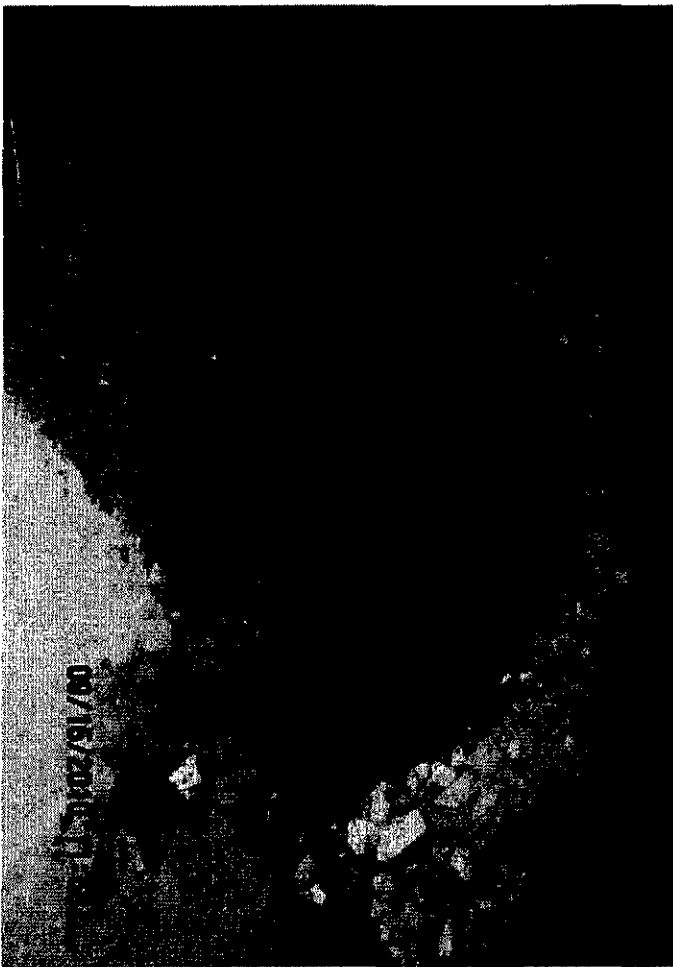
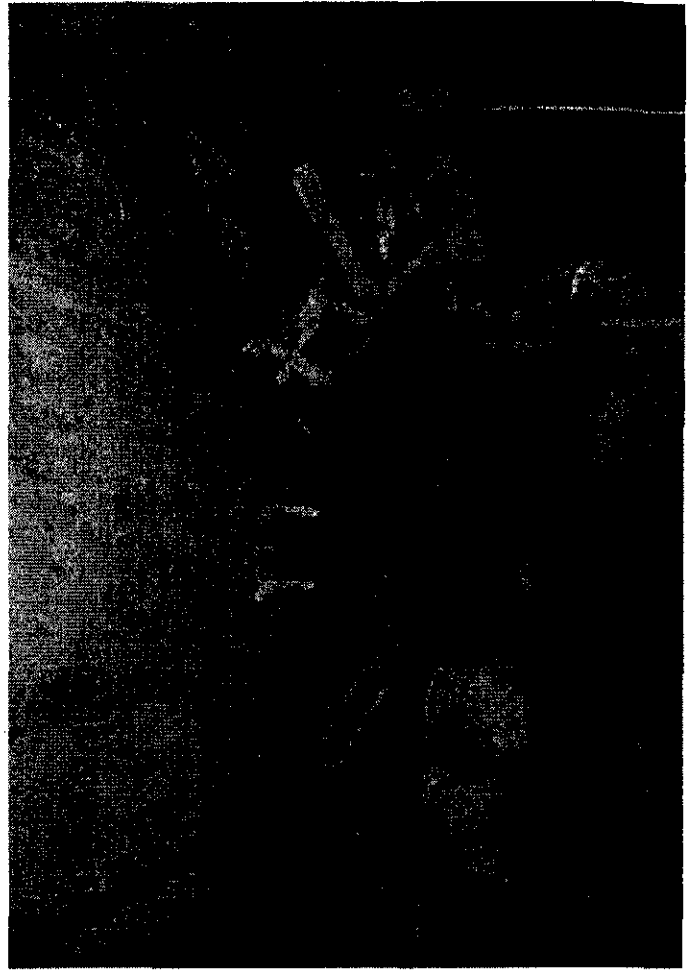
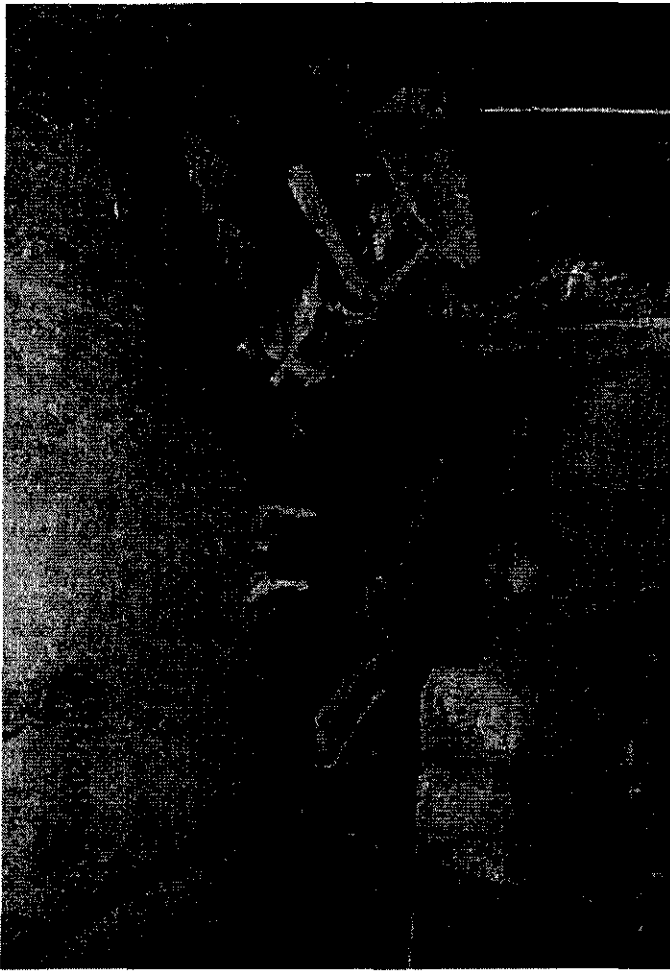
Based on your review of the pictures, will you provide approval to resume staging material in the fines building?. Please let me know if you have any questions.

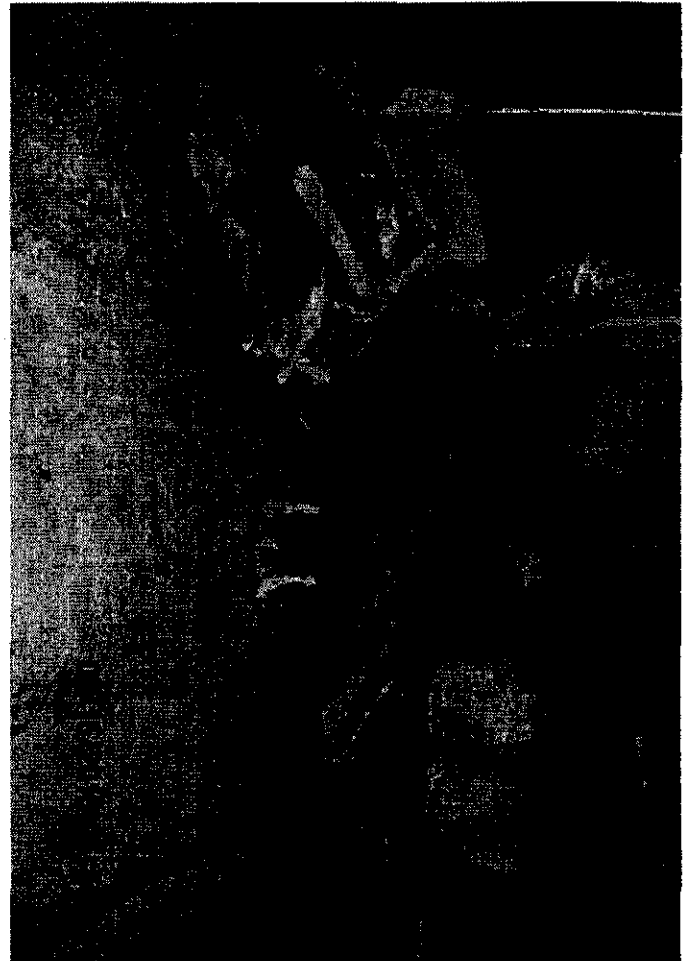
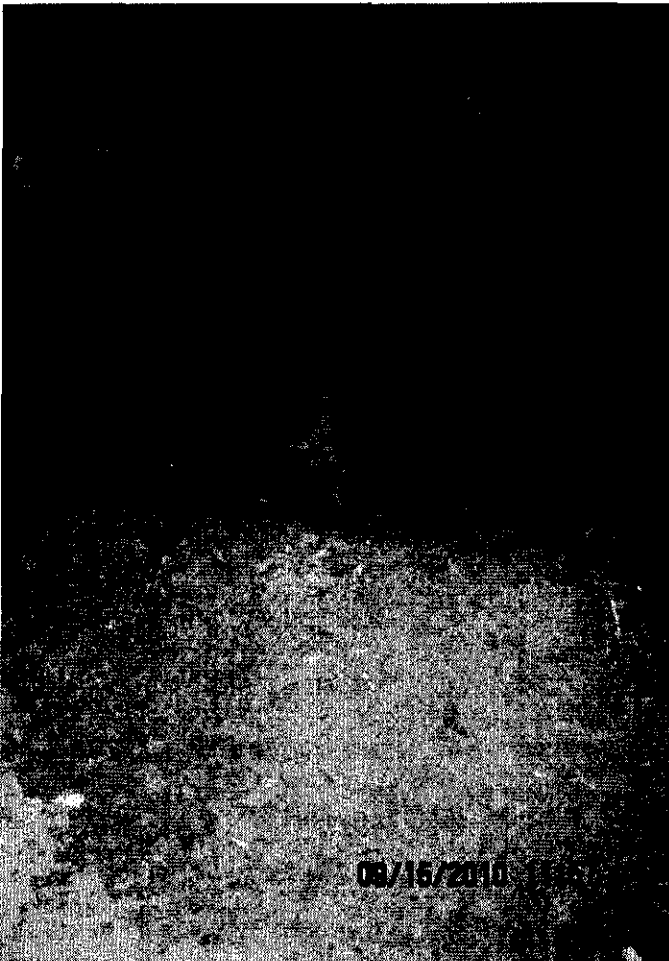
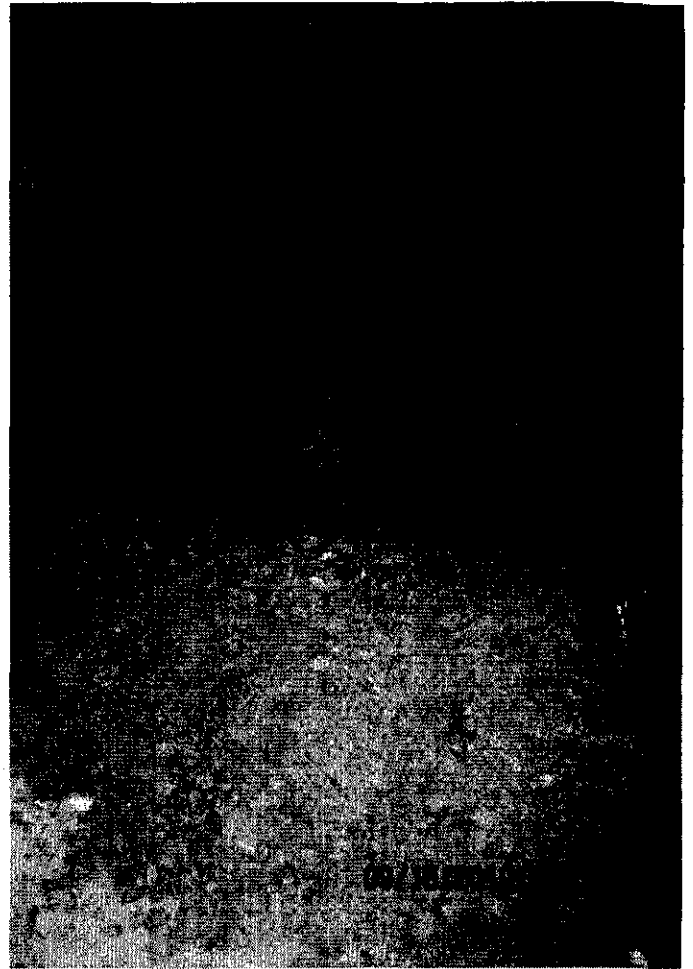
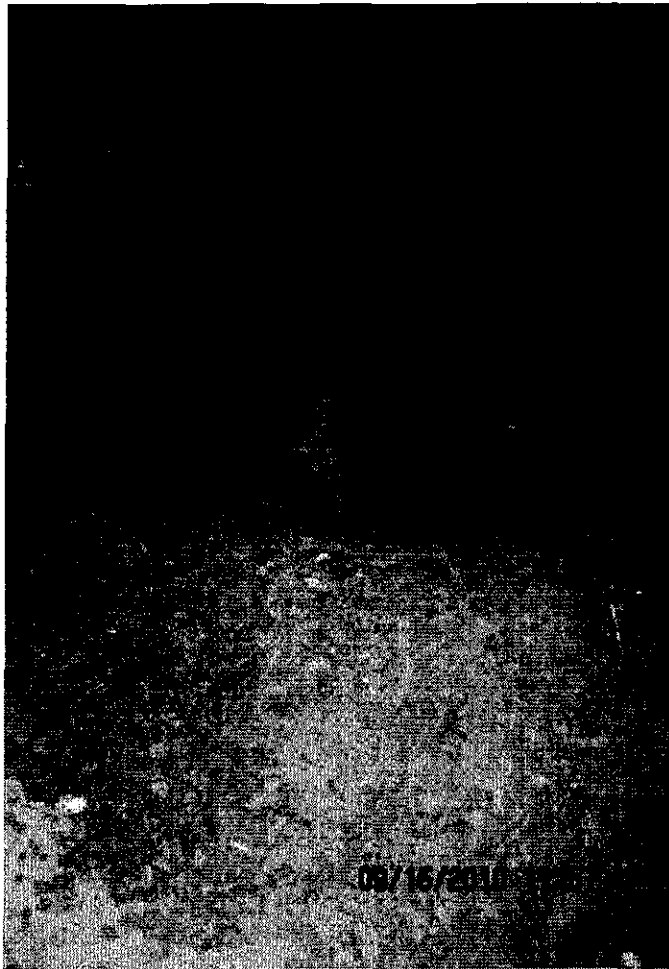
Thanks,

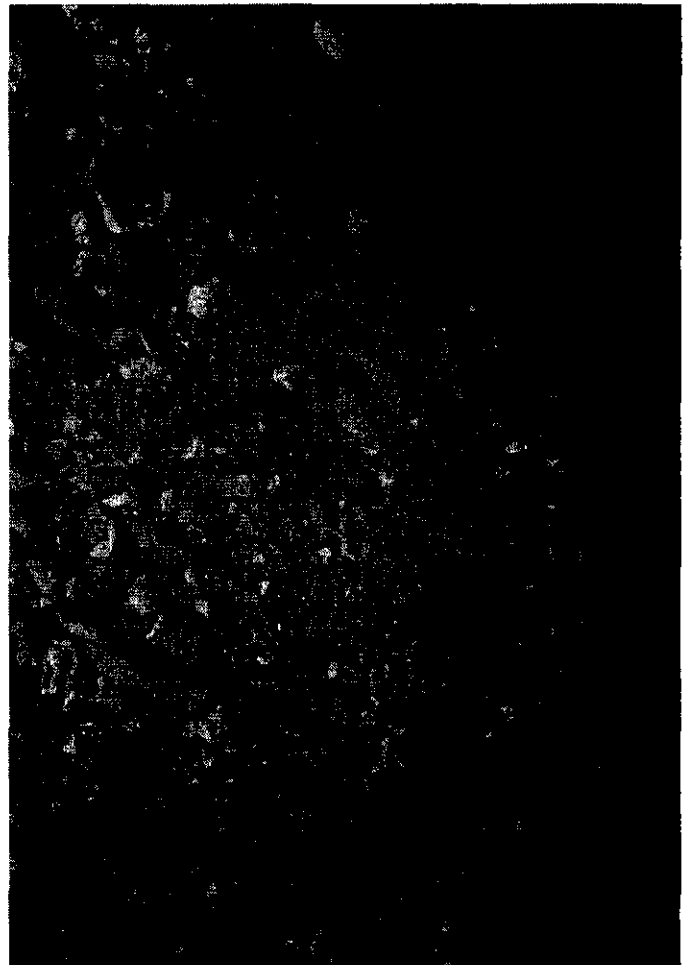
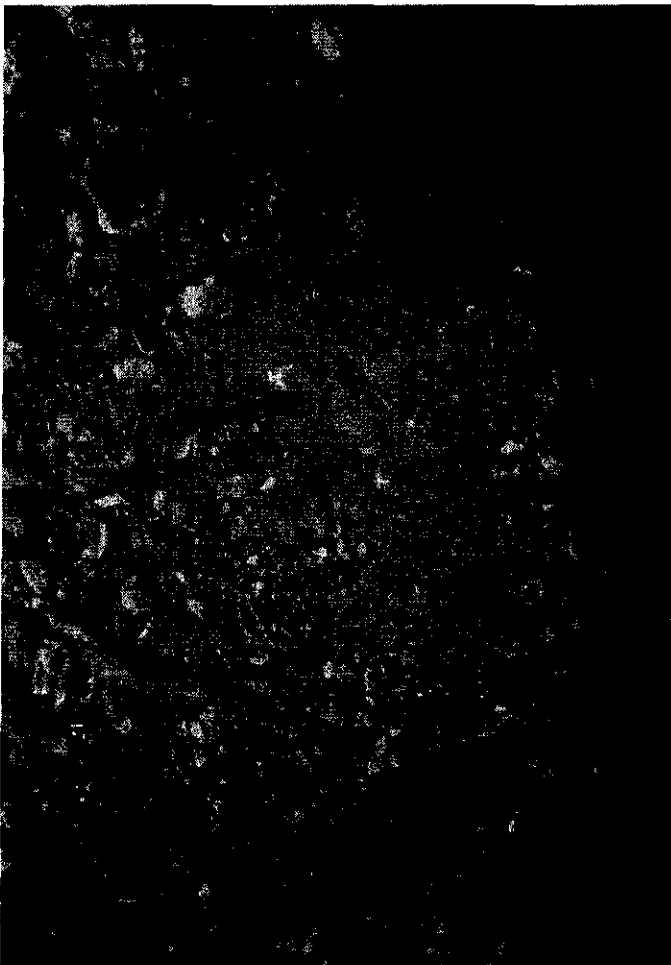
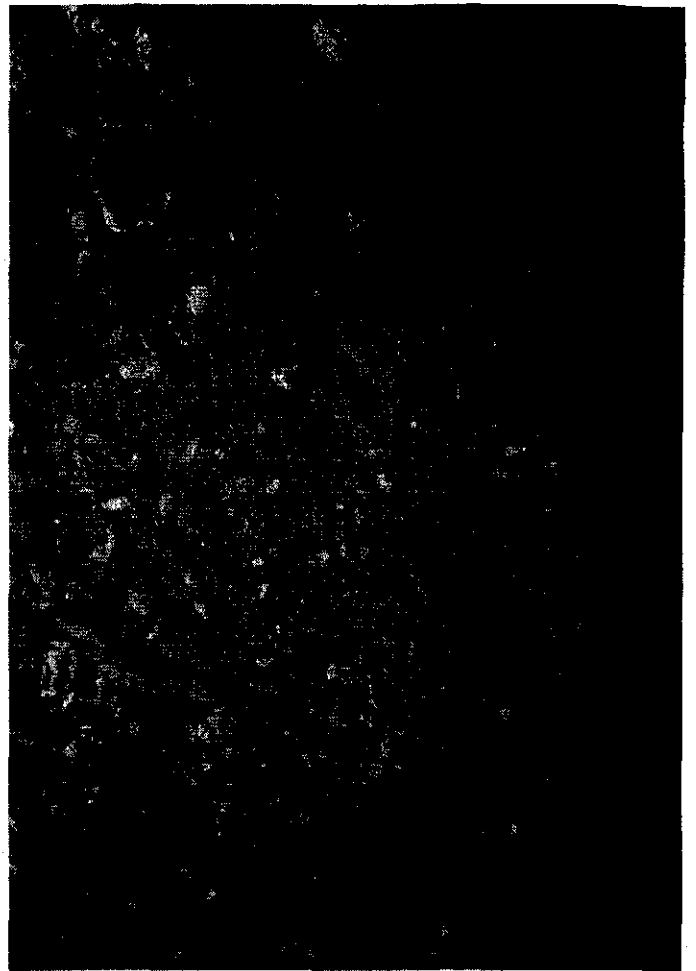
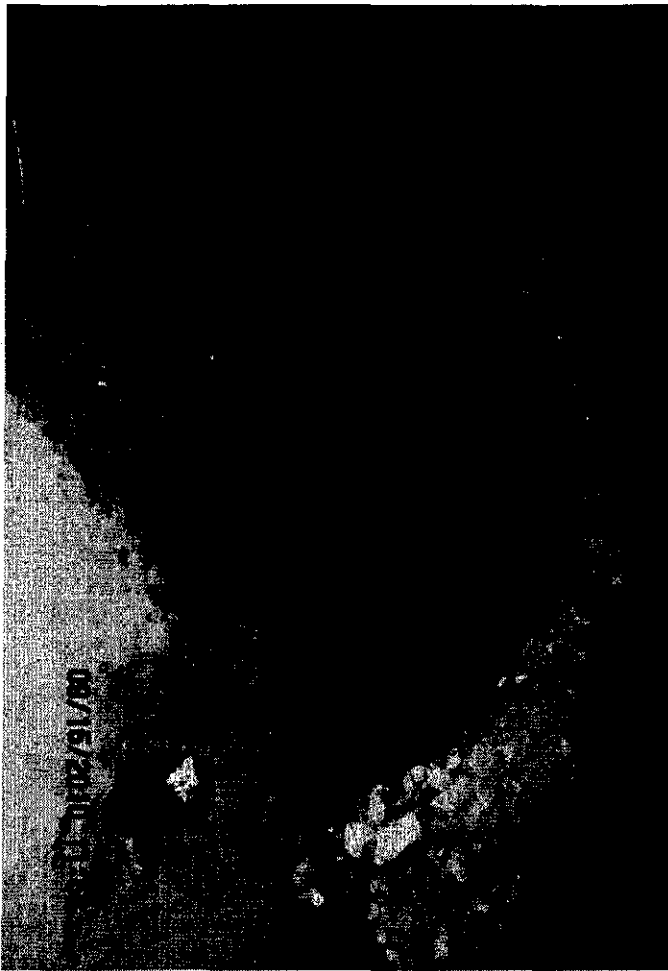
Jorge

**Jorge Y. Garcia PG**

ES&H Manager  
Estate of Chemetco, Inc.  
3754 Chemetco Lane  
Hartford, IL 62048  
off: (618) 254-4381 x 372  
fax: (618) 254-0138  
email: [jgarcia@chemetcoestate.com](mailto:jgarcia@chemetcoestate.com)







**Cahnovsky, Chris**

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**From:** Cahnovsky, Chris  
**Sent:** Wednesday, September 15, 2010 1:26 PM  
**To:** 'egstegin@cox.net'; jorge garcia; 'David Herrera'; 'donsam47@yahoo.com'  
**Cc:** 'Kerr.Michelle@epamail.epa.gov'; Rednour, Erin; Cozadd, Michelle  
**Attachments:** P1010209.JPG; P1010207.JPG

All,

Michelle Cozadd and I conducted an inspection today at the Chemetco site. There are two issues that need to be resolved before any more material can be placed in the Fines Building:

1. In the Fines Building the IEPA observed a pile of floor sweeping. In this pile was a filter plate, metal pipe, wood and other trash. Also concrete with rebar and fiberglass decking waste were observed in the building. This type material must be kept out of the Fines Building and managed as a waste. No more material may be placed into the Fines Building until this waste has been removed. Jorge Garcia has called me let me know that the material has been removed and he will forward pictures to the Agency.
2. The IEPA and USEPA are taking the position that all the concrete from the Tank House is a waste. According to the approved demolition plan the concrete pits will be broken on the floor of the Tank House and the concrete debris will be put into a temporary working pile inside the building and then transferred into containers or trucks for off-site disposal. The concrete must be managed as a waste. It appears that the majority of the concrete is a non-hazardous special and has already been profiled into Roxana Landfill. The smaller rubble/cobble/crums will need to be separated from the other floor debris and sampled for hazardous waste characteristics. All practical measures must be taken to keep this concrete out of the Fines Building and make correct waste determinations.

I will be in all day tomorrow if you would like to discuss this further.

Chris

Chris Cahnovsky, Regional Manager  
Illinois Environmental Protection Agency  
Bureau of Land - Field Operations Section  
2009 Mall Street  
Collinsville, Illinois 62234  
618/346-5120  
FAX: 618/346-5155





FOXANA LANDFILL  
4600 CAMOKIA CREEK RD  
FOXANA, IL. 62084  
654-3929

000290  
MIDWEST SANITARY SERVICES  
P.O. BOX 83  
WOOD RIVER, IL 62095  
Contract: CHEMETCO CONTRACT

DATE		GRID
DW00068 DARLENE W		WEIGHMASTER
DATE IN	25 August 2010	TIME IN 7:46 AM
DATE OUT	26 August 2010	TIME OUT 7:48 AM
VEHICLE	MAR040065	ROLL OFF
REFERENCE	ORIGIN ILLINOIS	

Gross Weight 43,700.00 lb Inbound --  
Stored Tare Weight 35,040.00 lb  
Net Weight 8,660.00 lb 4.33 TM

QTY	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
1.00	EA	FL000				

All customers exiting their vehicles must abide by all Republic Services Inc. safety standards, including the proper use of hard hats and ANSI 2 standard hi-vis reflective clothing. By Signature below, customer acknowledges receipt and understanding of said safety rules.

SIGNATURE

TENDERED
CHANGE
CHECK NO.

Bm  
4074

ROXANA LANDFILL  
4400 CAHOKIA CREEK RD  
ROXANA, IL. 62084  
618-656-3929

000290  
MIDWEST SANITARY SERVICES  
P.O. BOX 83  
WOOD RIVER, IL 62095  
Contract: CHEMETCO CONTRACT

SITE Y9	TICKET 091724	GRID
WEIGHMASTER		
CRYSTAL H		
DATE IN 30 August 2010		TIME IN 7:55 AM
DATE OUT 30 August 2010		TIME OUT 7:55 AM
VEHICLE MWR040065		ROLL OFF
REFERENCE	ORIGIN ILLINOIS	

00 Gross Weight 46,280.00 lb Inbound -  
Stored Tare Weight 35,040.00 lb  
Net Weight 11,240.00 lb 5.62 TN

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	FEES
5.62	TN	CA 11000				

All customers exiting their vehicles must abide by all Republic Services Inc. safety standards, including the proper use of hard hats and ANSI 2 standard hi-vis reflective clothing. By Signature below, customer acknowledges receipt and understanding of said safety rules.

SIGNATURE \_\_\_\_\_

NET AMOUNT

TENDERED

CASH

CHECK NO.

4074

# WASTE TRACKING RECEIPT

DISPOSAL SITE:

Roxbury Landfill

PROFILE NUMBER:

GENERATOR:

Cleco

LOCATION:

Rt 3

WASTE DESCRIPTION:

Reg. Trash

TONS/YARDS:

40

GENERATORS SIGNATURE OR DESIGNEE:

James Integrated Services

562

TRANSPORTER:

Midwest Safety Service

DRIVERS SIGNATURE:

[Signature]

DATE:

8/30/10

ACCEPTED BY:

CH

DATE:

8/30/10

White-Generator/Yellow-Transporter  
RDF WILL NOT RETAIN A COPY OF THIS DOCUMENT

4074

DATE 09/20/02	GRID
AL00065 ANDEL L. WEIGHMASTER	
DATE IN 31 August 2010	TIME IN 7:59 am
DATE OUT 31 August 2010	TIME OUT 7:59 am
VEHICLE MUR04-0065	ROLL OFF
REFERENCE	ORIGIN ILLINOIS

Gross Weight	45,840.00 lb
Storage Tare Weight	35,040.00 lb
Net Weight	10,800.00 lb 5.40 TN

DATE	DESCRIPTION	AMOUNT	EXTENSION	NET AMOUNT
				TENDERED
				CHANGE
				CHECK NO.

SIGNATURE \_\_\_\_\_

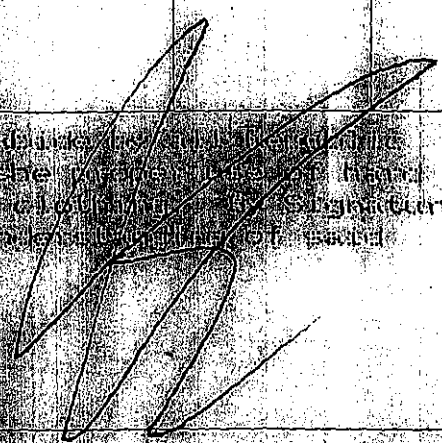
SITE Y9	TICKET 092321	GRID
WEIGHMASTER		
CRYSTAL H		
DATE IN 1 September 2010		TIME IN 8:29 AM
DATE OUT 1 September 2010		TIME OUT 8:29 AM
VEHICLE MLW04-0065		ROLL OFF
REFERENCE	ORIGIN ILLINOIS	

Inbound -

555 TN

Vehicle must adhere to the following  
requirements, including the weight limit  
and axle load. The vehicle must be  
weighed on a scale and a receipt must be  
provided to the driver.

SIGNATURE



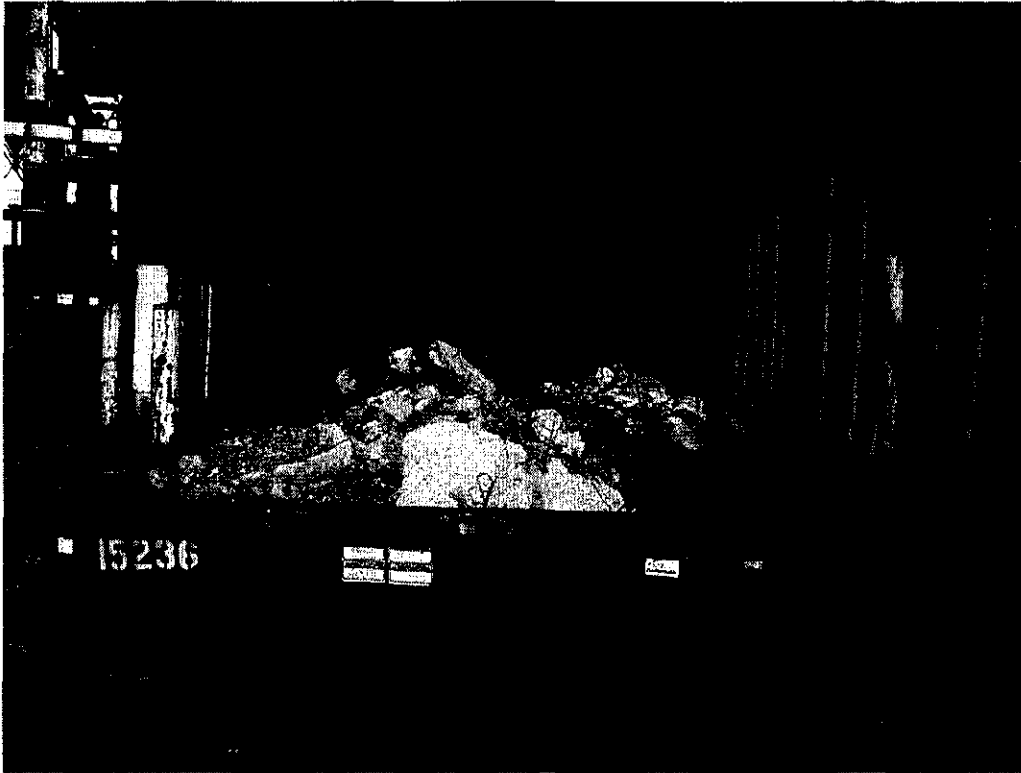
NET AMOUNT
TENDERED
CHANGE
CHECKING

12/1/10 1074

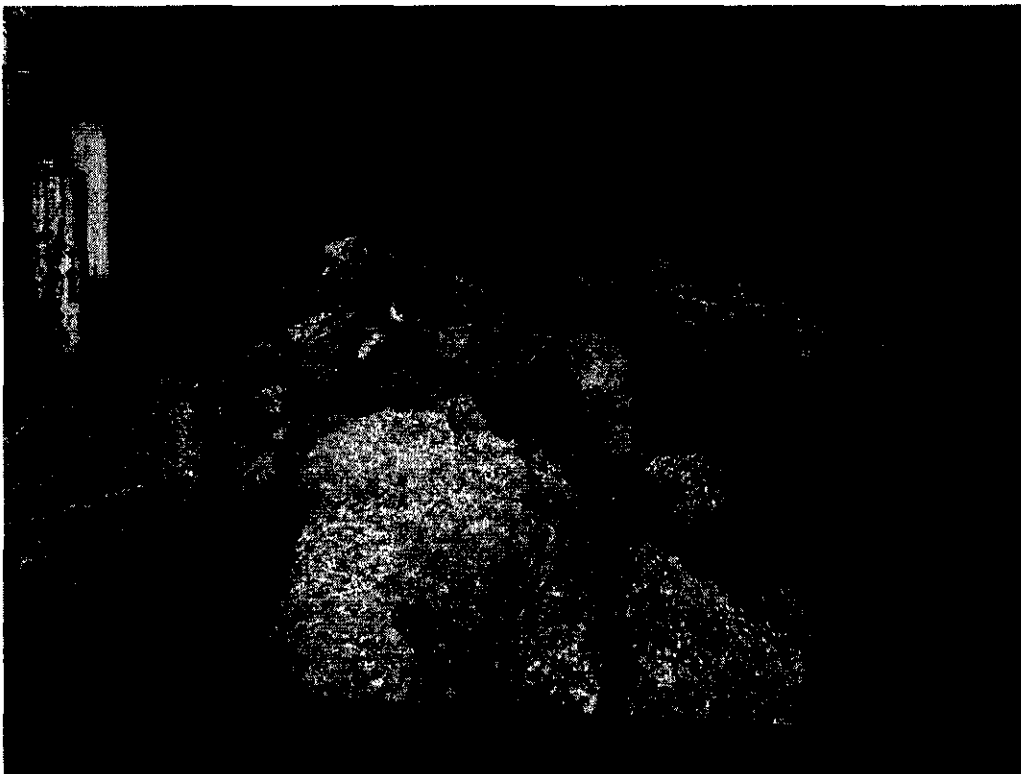




**DIGITAL PHOTOGRAPHS** File Names: 1198010003 ~ 0952010-[Exp. #001-014].jp



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: Northwest  
Photo by: Chris  
Cahnovsky  
Exposure #: 001  
Comments: Roll-off box  
of concrete loaded  
for Roxana Landfill.  
Box is over weights  
and needs to be  
reloaded.



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: Northwest  
Photo by: Chris  
Cahnovsky  
Exposure #: 002  
Comments:



**DIGITAL PHOTOGRAPHS** File Names: 1198010003 ~ 09152010-[Exp. #001-014].jp



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: West  
Photo by: Chris  
Cahnovsky  
Exposure #: 005  
Comments: MBM pile  
remaining after  
clean up of the Fine  
Building Hallway



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: Southwest  
Photo by: Chris  
Cahnovsky  
Exposure #: 006  
Comments: Remaining  
concrete from cell  
demolition in Tank  
House





**DIGITAL PHOTOGRAPHS** File Names: 1198010003 ~ 0952010-[Exp. #001-014].jp



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: Northwest  
Photo by: Chris  
Cahnovsky  
Exposure #: 009  
Comments: Trash in  
Fines Building



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: Northwest  
Photo by: Chris  
Cahnovsky  
Exposure #: 010  
Comments: Trash in  
Fines Building



***DIGITAL PHOTOGRAPHS*** File Names: 1198010003 ~ 0952010-[Exp. #001-014].jp



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: North  
Photo by: Chris  
Cahnovsky  
Exposure #: 013  
Comments: Concrete  
with trash



Date: 09/15/2010  
Time: 9:00 – 10:30  
Direction: Southeast  
Photo by: Chris  
Cahnovsky  
Exposure #: 014  
Comments: